

REMARKS / ARGUMENTS

Claims 1 and 6-8 have been amended, and Claims 3, 5, 10, and 12 have been canceled, without prejudice or disclaimer; therefore, Claims 1, 2, 4, 6-9, 11 and 13-15 are pending. Applicant has carefully considered the application in view of the Examiner's action and, in light of the foregoing amendments and the following remarks, respectfully requests reconsideration and full allowance of all pending claims.

Claims 1-2, 6-9, and 13-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Pub. No. 2003/0012149 to Maggenti et al. (hereinafter "*Maggenti*") in view of U.S. Patent Pub. No. 2003/0119533 to Sarkkinen et al. (hereinafter "*Sarkkinen*"). Claims 4 and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Maggenti* in view of *Sarkkinen* and in further view of U.S. Patent Pub. No. 2003/0210676 to Wu (hereinafter "*Wu*"). In response, Applicant has amended independent Claims 1 and 8 such that they now more clearly distinguish, and are patentable over the cited references.

Specifically, independent Claims 1 and 8 have been amended to more particularly point out and distinctly claim one of the distinguishing characteristics of the present invention, namely, that the user equipment (UE) is cleared of any record of a cell identifier, as supported in the specification at page 7, line 22 – page 8, line 20, and by Fig. 4 of the application as originally filed, thereby adding no new matter to the application.

Maggenti has been cited as fully disclosing Applicant's invention as recited in Claims 1 and 8, except merely for the teaching that the message is one of the following: a Cell Update Confirm message or a URA Update Confirm message or a RRC Connection setup message; and, in response to the message, clearing from the UE any record of a cell identifier, for which *Sarkkinen* was cited. *Sarkkinen*, however, fails to either teach or suggest clearing from the UE any record of a cell identifier. In clear contrast to Applicant's invention, *Sarkkinen* teaches cleaning or clearing of old information from a database which is located at the network (paragraphs 76-79), not at a UE which receives a message from the network, as recited in Applicant's independent Claims 1 and 8. The cleaning or clearing of the record may be based on the UE ID, as the Examiner indicated with respect to *Sarkkinen*, but not at the UE, as Applicant claims.

In view of the foregoing, it is apparent that none of the cited references, either singularly or in any combination, teach, suggest, or render obvious the unique combination now recited in independent Claims 1 and 8 that the user equipment (UE) is cleared of any record of a cell identifier. It is therefore respectfully submitted that Claims 1 and 8 clearly and precisely distinguish over the cited combination of references in a patentable sense, and are therefore allowable over those references and the remaining references of record. Accordingly, it is respectfully requested that the rejection of Claims 1 and 8 under 35 U.S.C. § 103(a) as being unpatentable over *Maggenti* in view of *Sarkkinen* be withdrawn.

Claims 2, 4, 6, 7, 9, 11, and 13-15 depend from and further limit independent Claims 1 and 8, in a patentable sense, and, for this reason and the reasons set forth above, are also deemed to be in condition for allowance. Accordingly, it is respectfully requested that the rejections of dependent Claims 2, 4, 6, 7, 9, 11, and 13-15 be withdrawn, as well.

Applicant does not believe any fees are due in connection with the filing of this paper; however, in the event that any other fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper, to Deposit Account No. 50-2032 of Scheef & Stone, L.L.P.

Applicant has now made an earnest attempt to place this application in condition for allowance, or in better condition for appeal. Therefore, Applicant respectfully requests, for the reasons set forth herein and for other reasons clearly apparent, full allowance of Claims 1, 2, 4, 6-9, 11 and 13-15 so that the application may be passed to issue.

Should the Examiner have any questions or desire clarification of any sort, or deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

SCHEEF & STONE, L.L.P.

/jds/

Jack D. Stone, Jr.
Reg. No. 38,324

5956 Sherry Lane, Suite 1400
Dallas, Texas 75225
Telephone: (214) 706-4207
Fax: (214) 706-4242
jack.stone@scheefandstone.com